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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

June 5, 2024

Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

**STAFF'S FIRST DATA REQUEST**  
VIA E-MAIL

Matt Everngam  
Director Regulatory Affairs  
208 Wildlight Ave  
Yulee, FL 23097

**Re: Docket No. 20240050-GU - Petition for approval of transportation service agreement with Florida Public Utilities Company by Peninsula Pipeline Company, Inc.**

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff requests that Peninsula Pipeline Company, Inc. (Peninsula) and Florida Public Utilities Company (FPUC) provide responses regarding the petition for approval of transportation service agreement for the Pioneer Supply Header pipeline service.

1. Please confirm that FPUC would recover the monthly reservation charge paid to Peninsula through the Purchased Gas Adjustment (PGA) and swing service rider. If applicable, please calculate expected impact on the PGA and swing service rider.
2. Paragraph 11 of the petition states, "FPUC wishes to maintain and enhance the ability to transport the commodity across the Pioneer header." Please explain whether FPUC's ability to transport natural gas to the delivery points listed in Exhibit A is dependent upon the asset transfer in 20240051-GU.
3. Please refer to paragraph 11, which describes the existing firm transportation agreement between FCG and FPUC. Please provide a copy of the agreement, including Exhibit A.
4. Paragraph 11 of the petition states that the proposed monthly reservation charge would be "the same rate previously charged to FPUC by FCG," but later in the paragraph, the petition states the rate would be "consistent with" or "at a level equivalent to" (paragraph 12) the rate previously charged by FCG.
  - a. Please clarify the language used across the two paragraphs and explain whether Peninsula intends to charge the same rate as FCG.

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- b. Please account for any difference between the current rate being charged by FCG, and the rate that would be charged by Peninsula. If there is a difference, please explain why.
  - c. Please provide an example of the cost impact, if any, expected for an average FPUC residential customer's monthly bill.
5. Please refer to the petition, paragraph 12. It states, "The service level is needed for FPUC to serve current customers located within the area of the Peninsula Pipeline and allow FPUC the necessary capacity to expand its service to potential new customers. Additionally, this service level will bring supply reinforcement to FPUC." Please explain how supply reinforcement is necessary to serve current customers of FPUC and its benefits to existing customers.
6. Please indicate whether the three delivery points discussed in Exhibit A to the transportation service agreement are currently operating. If so, please clarify which utility provides service to customers downstream from the delivery points.

Please file all responses electronically no later than June 14, 2024 through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at [kmcclell@psc.state.fl.us](mailto:kmcclell@psc.state.fl.us) or at 850.413.6814 if you have any questions.

Thank you,

*/s/Kate McClelland*

Kate McClelland

Public Utility Analyst I

Cc: Office of Commission Clerk